

Richard M. Heimann (State Bar No. 63607)
rheimann@lchb.com
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Bruce L. Simon (State Bar No. 96241)
bsimon@pswplaw.com
PEARSON, SIMON, WARSHAW & PENNY, LLP
44 Montgomery Street, Suite 2450
San Francisco, CA 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-9008

Class Counsel for the Direct Purchaser Class Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. M07-1827 SI

MDL No. 1827

This Document Relates to:
ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF BRENDAN P.
GLACKIN IN SUPPORT OF DIRECT
PURCHASER CLASS PLAINTIFFS'
RESPONSE TO HITACHI, LTD'S, HITACHI
DISPLAYS, LTD'S AND HITACHI
ELECTRONIC DEVICES (USA), INC.'S
OBJECTIONS TO SPECIAL MASTER'S
DECEMBER 22, 2010 ORDER**

The Honorable Susan Illston

I, Brendan P. Glackin, do declare as follows:

1. I am a partner with the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, Co-Lead Counsel for the Direct Purchaser Class Plaintiffs. I have personal knowledge of the matters described herein.

2. Attached as Exhibit A to this declaration is a true and correct copy of the transcript of proceedings held before Judge Susan Illston in *In Re: TFT-LCD (Flat Panel) Antitrust Litigation*, dated September 10, 2010.

3. Attached as Exhibit B to this declaration is a true and correct copy of the Direct Purchaser Plaintiffs' letter brief to Special Master Martin Quinn in support of their motion to compel, dated October 25, 2010.

4. Attached as Exhibit C to this declaration is a true and correct copy of the objection filed by the Directorate General for Competition division of the European Commission, dated November 22, 2010.

5. Attached as Exhibit D to this declaration is a true and correct copy of the response to the petition of inquiry from the Japan Fair Trade Commission, dated October 19, 2010.

6. Attached as Exhibit E to this declaration is a true and correct copy of Exhibit N to the Kent Roger Declaration in Support of Hitachi Defendants' Objections to Special Master's December 22, 2010 Order, the transcript of proceedings held before Special Master Martin Quinn in *In Re: TFT-LCD (Flat Panel) Antitrust Litigation*, dated December 10, 2010.

7. Attached as Exhibit F to this declaration is a true and correct copy of *In Re: Methionine Antitrust Litigation*, No. C-99-3491 CRB (JCS) (N.D. Cal. July 29, 2002).

8. Attached as Exhibit G to this declaration is a true and correct copy of Direct Purchaser Plaintiffs' reply brief to Special Master Martin Quinn in support of their motion to compel, dated December 7, 2010.


9. Attached as Exhibit H to this declaration is a true and correct copy of an electronic mail from Kent M. Roger to Special Master Martin Quinn and Brendan P. Glackin, dated October 4, 2010.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 21st day of January, 2011, in San Francisco, California.

Dated: January 21, 2010

By: _____


Brendan Glackin

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
Richard M. Heimann (Bar No. 63607)
Joseph R. Saveri (State Bar No. 130064)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008